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October 17, 2013

Via Federal Express

Ms. Grace Co, Enforcement Specialist
U.S. Environmental Protection Agency, Region 5
Superfund Division, Enforcement and Compliance Assurance Branch
77 West Jackson Boulevard, (SE-5J)
Chicago, IL 60604-3590

Re: Request for Information Pursuant to Section 104(e) of CERCLA
Lusher Street Groundwater Contamination Site, Elkhart, Indiana
CERCLIS ID No.: IND 982073785

Dear Ms. Co:

On behalf of Altec Engineering, Inc. ("Altec" or the "Company"), we are submitting the enclosed response to the above-referenced information request (the "Information Request"). The Information Request was received by the Company on September 20, 2013 and therefore this response is submitted timely.

Please find below a list of all persons contributing information to responses to this Information Request, along with a set of General Objections which Altec incorporates by reference here in the responses to each numbered request. Altec's search did not uncover any responsive documents to the Information Request.

Persons Contributing Information to Responses to the Information Request

- Mr. Gary Robinson, President
- Mr. Derek DeGraff, Human Resources Director
- Joel T. Bowers, Attorney for Altec, Barnes & Thornburg LLP

General Objections

- Altec objects to the Information Request to the extent it seeks to impose upon it obligations which are beyond those authorized to be imposed under 42 U.S.C. § 9604(e).
- Altec objects to the Instructions for the Information Request to the extent it would require it to seek information in the possession or control of persons not under its control, or to furnish information not based on personal knowledge. The Company further objects to these Instructions to the extent they seek information protected by the attorney-client privilege or which constitutes attorney work product.
- Altec objects to Instruction 6 in the Information Request to the extent it purports to require supplemental responses which is not authorized under 42 U.S.C. § 9604(e).
- Altec objects to the requirement that this response be certified because nothing in 42 U.S.C. § 9604(e) requires or authorizes U.S.EPA to impose such a requirement.

Submission of the enclosed responses should not be construed as waiver of any objection and Altec reserves all its rights, privileges and defenses. Please feel free to contact me should you have any questions regarding this response.

Sincerely,

BARNES & THORNBURG LLP



Joel T. Bowers

JTB/dac
Enclosures

ALTEC ENGINEERING, INC.

Response and Objections to Request for Information Pursuant to 104(e) of CERCLA for
Lusher Street Groundwater Contamination Site, Elkhart, Indiana
CERCLIS ID No.: IND 982073785

RESPONSES TO REQUESTS

1. State the dates during which you or your company have owned, operated, or leased a facility or any part thereof located within the boundaries of the site and provide copies of all documents evidencing or relating to such ownership, operation, or lease arrangement (e.g. including but not limited to purchase and sale agreements, deeds, leases, etc.)

RESPONSE:

Altec Engineering, Inc. ("Altec" or the "Company") has not owned any real property located within the boundaries of the Site. From approximately April 1988 to July 1994, Altec leased a portion of the property located at 1723 W. Lusher Ave. Elkhart, Indiana (the "W. Lusher Lease Property") from the property's owner, Mr. Anthony Ienna. During its tenure at the W. Lusher Lease Property, Altec manufactured fiberglass parts including R.V. parts, refrigerator drip pans, agricultural spray tanks, and caps for cab-over trucks.

In July 1994 when Altec's lease expired, the Company entered into a land contract for the property located at 28274 County Road 20 West, Elkhart, IN (the "County Road 20 Property"). At that time, Altec's operations were moved from the W. Lusher Lease Property to the County Road 20 Property where Altec operations continue to date. The County Road 20 Property is located outside the Site boundary.

Although it has conducted a search, Altec has not located any documents evidencing its lease arrangement (from nearly 20 years ago) with the owner of the W. Lusher Lease Property, Mr. Ienna.

2. Did you or any other person or entity ever use, purchase, store, treat, dispose, transport or otherwise handle any material containing chlorinated solvents, including but not limited to, trichloroethylene (TCE); trichloroethane (1,1,1-TCA); dichloroethene (trans 1,2 DCE; cis-1,2-DC; or 1,1-DCE) or tetrachlorethylene (PCE) at a facility within the boundaries of the site? If the answer to this question is anything but an unqualified "no," with respect to each facility identify:
 - a) the chemical composition, characteristics, physical state (e.g., solid, liquid) of each material;
 - b) who supplied the material;
 - c) how, when, and where the material was used, purchased, generated, stored, treated, transported, disposed of or otherwise handled;

- d) the quantity of such materials used, purchased, generated, stored, treated, transported, disposed of or otherwise handled;
- e) all supervisory personnel for areas where chlorinated solvents were identified above. For each person identified, indicate the years during which they were a supervisor and, to the best of your knowledge and belief, their duties and responsibilities.

RESPONSE:

Altec has no knowledge of the use, purchase, storage, treatment, disposal, transport or handling of materials containing chlorinated solvents at the W. Lusher Lease Property or any other property with the boundaries of the Site. Chlorinated solvents are not typically used in fiberglass manufacturing processes and Altec did not use chlorinated solvents.

- 3. Identify all past and present solid waste management units (e.g., waste piles, landfills, surface impoundments, waste lagoons, waste ponds or pits, tanks, container storage areas, etc.) at each facility you or your company have owned, operated, or leased within the boundaries of the site. For each such solid waste management unit, provide the following information:
 - a) a map which shows the unit's boundaries and the location of all known solid waste management units, whether currently in operation or not. This map should be drawn to scale, if possible, and clearly indicate the location and size of all past and present units.
 - b) the type of unit (e.g., storage area, landfill, waste pile, etc.) and the dimensions of the unit;
 - c) the dates that the unit was in use;
 - d) the purpose and past usage of the unit (e.g., storage, spill containment, etc.);
 - e) the quantity and types of materials (hazardous substances and any other chemicals) located in each unit;
 - f) the construction (materials, composition), volume, size, dates of cleaning, and condition of each unit; and
 - g) if unit is no longer in use, describe how the unit was closed and what actions were taken to prevent or address potential or actual releases of waste constituents from the unit.

RESPONSE:

Altec objects to this question as unnecessary since it did not use chlorinated solvents at the W. Lusher Lease Property and is not aware of the use purchase, storage,

treatment, disposal, transport or handling of any materials containing chlorinated solvents at any property within the boundaries of the Site. Without waiving its objection, the Company is not aware of any impoundments, waste lagoons, waste ponds, pits, or tanks at the W. Lusher Lease Property. Because the area outside the building at the W. Lusher Lease Property was too small to store materials, trash hoppers were located inside the building to dispose of waste materials which typically included packaging materials, fiberglass trimmings or "chop," and general office refuse.

4. Identify all leaks, spills, or releases into the environment of any chlorinated solvents or materials containing chlorinated solvents that have occurred at or from any facility you or your company have owned, operated, or leased within the boundaries of the site. In addition, identify:
 - a) when, where, and how such leaks, spills or releases occurred;
 - b) the amount of each leak, spill or release;
 - c) activities undertaken in response to each such leak, spill or release, including the notification of any agencies or governmental units;
 - d) investigations of the circumstances, nature, extent or location of each leak, spill or release, including the results of any soil, water (ground and surface), or air testing undertaken; and
 - e) all persons with information relating to these leaks, spills or releases.

RESPONSE:

Altec is unaware of any leaks, spills, or releases of chlorinated solvents at the W. Lusher Lease Property because the Company did not use purchase, store, treat, dispose of, transport or handle chlorinated solvents.

5. Provide copies of all local, state, and federal environmental permits ever granted for any facility (or any part thereof) you or your company have owned, operated, or leased within the boundaries of the site (e.g., RCRA permits, NPDES permits, etc.)

RESPONSE:

Although Altec has searched its records, the Company has not located any environmental permits relating to its operations at the W. Lusher Lease Property.

6. Identify any persons or entities, other than those responding to this information request, that may have information about the history, use, purchase, storage, treatment, disposal, transportation or handling of any materials containing chlorinated solvents at any facilities in the area identified as the Lusher Street Ground Water site.

RESPONSE:

- John Kampars, former Altec Treasurer and shareholder
- Michael Gentzhorn, former Altec President and shareholder
- Alan Ludwig, former Altec shareholder
- Anthony Ienna, Owner or former owner of 1723 W. Lusher Ave

7. To the extent you believe that another person, including any previous property owner, is responsible for any leaks, spills or releases into the environment of any chlorinated solvents or materials containing chlorinated solvents at or from any facility you or your company have owned, operated, or leased within the boundaries of the site, identify:
- a) the name and address of that person or persons;
 - b) when, where, and how such leaks, spills or releases occurred;
 - c) the amount of each leak, spill or release; and
 - d) the detailed basis for your belief that each such person is responsible for leaks, spills or releases, including any transactional documents, reports, or other documentation supporting your belief.

RESPONSE:

As stated in response to Request 5, Altec is not aware of any leaks, spills, or releases into the environment of any chlorinated solvents or materials containing chlorinated solvents at the W. Lusher Lease Property which is the only property Altec operated within the boundaries of the Site. Therefore, Altec is unaware of any leaks, spills, or releases caused by "other persons including any previous property owner."

Respectfully submitted,

ALTEC ENGINEERING, INC.

By: Gary Robinson

Its: President

Date: October 16, 2013

CERTIFICATION

I hereby certify that the foregoing responses are true and correct to the best of my knowledge and belief based upon the information and records available to me.

ALTEC ENGINEERING, INC.

By: Gary Robinson

Its: President

Date: October 16, 2013

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